



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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RENEE CIPRIANO, DIRECTOR

217/782-3362

October 22, 2002

U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Mail Stop 0-7D3  
Washington, D.C. 20555-0001

RE: Exelon Nuclear - Dresden (Grundy and Will Counties)  
Power Rate Uprate for Units 2 and 3 - Kankakee River  
Log # C-1139-01 [NRC # DPR-19]

Gentlemen:

This Agency received a request on September 28, 2001 from Exelon Nuclear requesting necessary comments concerning the construction of additional cooling towers in conjunction with the power uprate for Units 2 and 3 at the Dresden Facility near Morris. We offer the following comments.

Based on the information included in this submittal, it is our engineering judgment that the proposed project may be completed without causing water pollution as defined in the Illinois Environmental Protection Act, provided the project is carefully planned and supervised.

These comments are directed at the effect on water quality of the construction procedures involved in the above described project and are not an approval of any discharge resulting from the completed facility, nor an approval of the design of the facility. These comments do not supplant any permit responsibilities of the applicant toward the Agency.

This Agency hereby issues certification under Section 401 of the Clean Water Act (PL 95-217), subject to the applicant's compliance with the following conditions:

1. The applicant shall not cause:
  - a. violation of applicable water quality standards of the Illinois Pollution Control Board, Title 35, Subtitle C: Water Pollution Rules and Regulation;
  - b. water pollution defined and prohibited by the Illinois Environmental Protection Act; or
  - c. interference with water use practices near public recreation areas or water supply intakes.
2. The applicant shall provide adequate planning and supervision during the project construction period for implementing construction methods, processes and cleanup procedures necessary to prevent water pollution and control erosion.
3. All areas affected by construction shall be mulched and seeded as soon after construction as possible. The applicant shall undertake necessary measures and procedures to reduce erosion during construction. Interim measures to prevent erosion during construction shall be taken and may include the installation of staked straw bales, sedimentation basins and temporary mulching. All construction within the waterway shall be conducted during zero or low flow conditions. The applicant shall be responsible for obtaining an NPDES Storm Water Permit prior to initiating construction if the construction activity associated with the project will result in the disturbance of 5 (five) or more acres, total land area. An NPDES Storm Water Permit may be obtained by submitting a properly completed Notice of Intent (NOI) form by certified mail to the Agency's Division of Water Pollution Control, Permit Section.

GEORGE H. RYAN, GOVERNOR

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4. The applicant shall implement erosion control measures consistent with the "Illinois Urban Manual" (IEPA/USDA, NRCS; 2002).

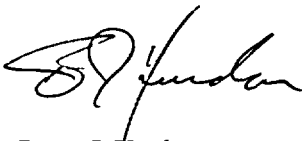
5. The applicant is advised that the following permit(s) must be obtained from the Agency: the applicant must obtain permits to construct sanitary sewers, water mains and related facilities prior to construction.

6. All discharges shall remain in compliance with the NPDES permit number IL0002224 or any modifications or renewals of the NPDES permit issued for the facility.

This certification becomes effective when the Nuclear Regulatory Commission, includes the above condition # 1 through # 6 as conditions of the requested permit issued pursuant to 10 CFR Chapter I.

This certification does not grant immunity from any enforcement action found necessary by this Agency to meet its responsibilities in prevention, abatement, and control of water pollution.

Sincerely,



Bruce J. Yurdin  
Manager, Watershed Management Section  
Bureau of Water

BJY:JRA

cc: IEPA, Records Unit  
IEPA, DWPC, FOS, Des Plaines  
IDNR, OWR, Schaumburg  
USEPA, Region 5  
Exelon Nuclear